BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of the Wireline Competition)
Bureau Seeking Comment on a Petition) DA 07-1846
By the State E-Rate Coordinators Alliance)
For Clarification and/or Waiver of E-Rate) CC Docket No. 02-6
Rules Concerning Technology Plan)
Creation and Approval Under the Schools)
And Libraries Universal Service Support`)
Mechanism.)

Initial Comments
of
Jack Sterling

May 8, 2007

Jack Sterling
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I wish to support the Petition submitted by the State E-rate Coordinators Alliance (SECA) for clarification and/or waiver of E-rate rules concerning technology plan creation and approval under the schools and libraries universal service support mechanism.

I further request that the FCC also waive any more strict interpretations with respect to FY 2007.

On March 23, 2007 in its weekly News Brief, the Schools and Libraries Division of USAC came out with clear instructions as to what it would be looking for when reviewing Form 486. Our State of Montana did not have a way of documenting when plans were update/"created". The SECA approach would align procedures with our State's existing technology plan procedures and review schedules. Currently our State Department of Education, which approves technology plans for E-Rate applicants, will not accept Technology Plans for 2008-2011. They have concluded that the requirement stating that they can only approve a technology plan for three years means that they can only approve a plan that expires in 2010.

Schools whose plans expire June 30, 2008, have to write the technology plans under existing rules before they can file the Form 470 for 2008. Most of our schools seek E-Rate funding for basic telephone service and Internet. There is little change from year to year in their technology plans. The school may add a phone line, cellular phone or increase the speed of their Internet

connection. Acceptance of currently approved plan as a pre-Form 470 filing condition would benefit our schools.

Three hundred Montana schools and libraries received E-Rate funding for 2006, for a total of $3,523,336. Most of these Applicants have to have a tech plan even if they did not apply for Internet, because they have DSL which is more than basic telephone service and therefore requires a tech plan.

We are aware that there are some very small school districts in Montana that receive only a few hundred dollars of E-Rate funding each year. They are required to complete technology plans regardless of their size. For example, the Molt Elementary School received funding in the amount of $265.62. Its funding included Internet discounts. The amount of work that the Molt School was required to do to receive E-Rate funds was the same amount of work that a school one hundred times its size was required to do. Please do not make it even more difficult for small rural schools in frontier areas to receive E-Rate funding.

Thank you for your consideration.

RESPECTFULLY SUBMITTED This 7th day of May, 2007

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